



Timothy D. Kevane
212-898-4008
timothy.kevane@sedgwicklaw.com

February 20, 2015

Via Electronic Filing

Hon. Colleen McMahon
United States District Court
500 Pearl Street, Room 1640
New York, N.Y. 10007

Re: *Consolidated Edison Company of New York, Inc. v. Lexington Insurance Company*,
Case No. 14-cv-06547-CM
Our File No.: 02331-007950

Dear Judge McMahon:

We represent defendant Lexington Insurance Company.

On February 11, 2015, the Court granted Lexington's request for a 60-day extension of the March 3rd discovery completion date for the purpose of completing depositions.

Since then, we have received a request from third-parties (Aegis and EIM) for additional time to produce their documents in response to document subpoenas, which required production by February 23, 2015. We have no objection to their request, nor does the plaintiff Con Edison.

Accordingly, we request the Court's approval to allow this particular discovery to be completed by March 23, 2015.

Thank for Your Honor's consideration of this request.

Respectfully,

A handwritten signature in black ink that reads "Tim Kevane".

Timothy D. Kevane
Sedgwick LLP

cc: David L. Elkind (via ECF)